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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

LOURDES CHAAR PADIN,
Plaintiffs,

v.

THE DEPARTMENT OF EDUCATION OF
PUERTO RICO (BOARD OF
EDUCATION) & COMMONWEALTH OF
PUERTO RICO

Defendants

CIVIL: 24-1351 (GMM)

About: Age Discrimination in Employment
Act of 1967 (ADEA), Americans with
Disabilities Act of 1990 (ADA), Law 504
retaliation

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|---------------------|-----------|
| RECEIPT # | 112 785 |
| AMOUNT: | \$ 405.00 |
| AUG 07 2024 | |
| CASHIER'S SIGNATURE | |

COMPLAINT

TO THE HONORABLE COURT:

The plaintiff appears LOURDES CHAAR PADIN, professor of the education public system of Puerto Rico, appears in his own right, very respectfully alleges and requests in this lawsuit:

THE PARTS:

1. The Plaintiff, Lourdes Chaar Padin, "Proffesor Chaar" she is an adult, proffesor of Departamento de Educaci3n from Estado Libre Asociado de Puerto Rico and lives in Urb. Dos Pinos Town House Calle 3 I-16, San Juan, P.R. 00923, her postal direction is PO Box 20112, San Juan, P.R. 00928. Her phone number is (787) 293-7903.
2. Defendant Departamento de Educaci3n of Puerto Rico (Board Of Education) and their Secretary Yanira Raices of The Departamento de Educaci3n of Puerto Rico (Board of Education), Deffendant directs the agency.
3. Deffendant Commonwealth of Puerto Rico is the legal entity to which the Secretary of Departamento de Educaci3n of Puerto Rico (Board of Education) is responsible for the

violations of the law, discrimination and retaliation practices of the Departamento de Educacion of Puerto Rico (Board of Education) in this suit. The Federal Agency Equal Employment in May 30, 2024 Lourdes Chaar received a letter Determination of Charge, Notice of Right to Sue Within 90 Days and Conciliation Failure of Charge. The EEOC found a reasonable cause to believe that violations of the Age Discrimination in Employment Act of 1967, Title 1 of Americans with Disabilities act of 1990 (ADA).

4. The Department of Education ("Board of Education") who is the patron from the Plainffit and they respond for the acts of violation of Age Discrimination (ADEA), Americans with Disabilities (ADA) and 504 Retaliation and to these days the violation still occurs to this day. There address is, PO Box 190759, San Juan, Puerto Rico 00919-0759.

THE FACTS:

5. The plaintiff has a regular career position, as a English Professor from the Board of Education in Puerto Rico. At the moment Professor Chaar has worked for 30 years in the Board of Education in Puerto Rico.

6. From the beginning of February 14, 2020. Miss Vanesa Lopez Started as a director at the School Republica de Colombia. Until September 2022.

7. After Miss Lopez started her functions as a director. The director started a pattern of harassment against Prof. Chaar.

8. In February 2020, the director Lopez requested a meeting with her coordinator from the union Asociacion de Maestros de Puerto Rico Mr. Eliezer Nieves.

9. On February 24, 2020, the director Lopez mentions that she received a complaint from the **Director of the Instituto Tecnologico from the Board of Education of Puerto Rico and from the office of Legal Division.** In the meeting it was informed that Director Lopez was

going to harass, make a folder and check the attendance for the last 5 years. Also, the director mentioned that Chaar needed to sign a paper of assistance 4 times a day apart from using the regular punch from all the employees. Director requested that every time Prof. Chaar arrived at school the director must see that she is in the school and if there was an absence for one day she will need the evidence of the doctor, also that she will call the doctor to make sure it's true. Director Requested that Prof. Chaar was prohibited of going outside to eat. Director insisted that she prohibits Prof. Chaar to go to the Instituto Tecnologico to help her son with the ADA law or any other academics issues. In the meeting director informed that Mr. Luis Gonzalez Director of the Instituto Tecnologico called her for that request. From here it's the beginning of the harassment that it still persists and the reason why to make this claim.

10. As a consequence, the Director Lopez from February 2020 daily started rejecting the form known as DE14 (a form to justify any absence) so Prof. Chaar can get no discount for paycheck. Also, the Director made prof. Chaar sign assistance 4 times daily and aside from a regular punch and director threatened to make a discount in her paycheck. Because the director refused to accept any DE14. The Prof. Chaar had to go to the ex-Regional Director of San Juan, and she was the one who approved the DE14. Between the month of February and March 2020 before the pandemic. The director started waiting Prof. Chaar in her door of class very early in the morning so that Prof. Chaar could sign the paper of assistance apart from the regular punch that all employees do. This is clearly done to humiliate and harass the Prof. Chaar.

11. After the mentioned meeting the teacher's union Asociacion de Maestros de Puerto Rico made a complain PASO 2 (Convenio Colectivo). In the meeting that happened between by March 11, 2020. Miss Annie Marrero Gerente escolar Board of Education was made an agreement that the director had to do DE14 to Prof. Chaar and if necessary, it had to be fixed. Also, Miss

Annie Marrero notified that The Legal Division made a call to request Prof. Chaar not to help her son in his studies.

12. Also, in the meeting prof. Chaar informed that the Director Lopez says to her that “te miro pero no te escucho” also the harassment was mentioned in that moment. Even though there was an agreement the Director didn’t comply and still continuously refusing to approve the DE14. Forcing Prof. Chaar to go to the ex-Regional Director so the DE14 can be approved.

13. In the meeting Prof. Chaar informed that director Lopez was chasing her, and that the director says in front of the entire faculty “te miro pero no te escucho” and the director was restricting Prof. Chaar. Also, the director was screaming and intimidating and that she threatened that she will use any situation with the Insituto Tecnologico where her son was studying.

14. In that same time Prof. Chaar made a complain to the Federal Department of Education because the director of the Instituto Tecnologico was retaliating against Prof. Chaar for helping her son to helping with the ADA Law accommodations and the Board of Education did nothing to help the student.

15. In the meeting and conversation after the semester started from august 2020 and the whole semester. Director Lopez continued screaming to Prof. Chaar saying “bruta”, “te oigo pero no te escucho”. “vieja loca” and others words clearly directed to harm and insult Prof. Chaar.

16. From august 2020 during the whole semester and in front of every member of the faculty, the Director has started chasing the plainfitt and even in virtual reunions, the director critics unjustified, insults and director gives contradictory orders to Prof. Chaar. In addition, in august 2020 the director removed Prof. Chaar from the chat of Whatsapp where the whole faculty was a member of. In august 2020 every reunion from the faculty was virtual at least once a month. The director didn’t invite Prof. Chaar and never notified of the meeting or workshops making Prof.

Chaar feel humiliated and isolated from the rest of the faculty and forcing to find out with other professors about the meeting and workshops.

17. In August 2020 Director Lopez stated trying to change the function of the Prof. Chaar so she could work with Special Education with a Program called PAD. Directo knowing that she could not do that because it was areas where Prof. Chaar wasn't hired, and it was out of her functions. Specifically, the director Lopez tried to change Prof. Chaar to do functions as a Special Education and make Programas de Educativos Individuallizados (PEI) and the program (PAD).

18. For the month august 2020 Prof. Chaar presented a complaint with union. Informing that director wasn't informing changes, that director was ignoring, and director wasn't giving any instructions, making her feel that she wasn't part of the faculty, Prof. Chaar was being harassed and director was still not signing DE14.

19. In October 2020 Lopez ordered Prof. Chaar to go to the school after hours of School. En the meeting Lopez put a pen in Prof. Chaar hand so that she could sign a document accepting that Prof. Chaar was accepting to change her functions. But Prof. Chaar denied signing the director got decontrolled, started screaming and director put her finger in front of Prof. Chaar eyes, humiliating and instigating violence so Prof. Chaar make a reaction. But Prof. Chaar she a person with many years of service got scared, nervous, humiliated, confused and frustrated immediately started running from the place.

20. In January 2021 the teacher's union Asocacion de maestros de Puerto rico made a complain indicating that director was continuously disrespecting Prof. Chaar in meetings and victuals in front of everyone in the faculty.

21. In February 2021 the teacher's union made a complain because director was disrespecting Prof. Char in virtual meetings. In the complaint meeting was there Prof. Chaar, Coordinator of Asociacion de maestros, Yadira burgos superintendente auxiliar and others. The coordinator requested a cease and desist. Also, he it was indicated that there has been many times searching for a cease and desist. But the director still continues against Prof. Chaar.

22. In March 2021 UNETE ("Union Nacional de Educadores y Trabajadores de la educación") sent a letter director to the director Lopez in support of the claim of the teacher's union Asociacion de maestros and Prof. Chaar requesting a cease and desist of the harassment against Prof. Chaar.

23. In April 2021 the attorney Jorge Marchand sent a letter to the director requesting a cease and desist of the persecution against Prof. Chaar.

24. In May 2021 director Lopez was in a meeting with Prof. Chaar and the committee of the planification school in which Prof. Chaar was already part of. Director informed that the school had an increase of students that Prof. Chaar was still going to continue functions of special education for the semester of Augus 2021 and the change was done only to Prof. Chaar. The additional group Prof. Chaar was going to be assigned with additional group was PAD. (It's a group very hard to manage and it was out of her functions of Prof. Chaar). Also, in the meeting Director Lopez informed that Prof. Chaar was going to have 5 classes so she can have the group PAD. While other professors only had 4 groups. This happened without honoring her years of antiquity.

25. In the mentioned meeting by May 2021 director Lopez in front of other members of the faculty questioned the capacity of Prof. Chaar saying from other things she said "tu eres una bruta".

26. In June 2021 Prof. Chaar went to the office of Educacion Tecnica from the Board of Education. It was there Prof. Chaar, her son, Mr. Angel facilitator of special Education. Prof. Chaar informed that the Instituto Tecnologico de Rio Piedras where her son was studying has been interfering with her job using Director Lopez. Prof. Chaar was looking for a cease and desist from the harassment from the Instituto Tecnologico to her job in the School Republica de Colombia. Because the director Lopez informed a cease and desist so Prof. Chaar couldn't help her son the Instituto Tecnologico with the ADA Law.

27. In July 2021 Prof. Chaar made a complaint with the Union Asocaicon de maestros. In the meeting with the regional director of San Juan, Director Lopez, Coordinator of Asociacion de maestros and Prof. Chaar. The meeting came favorable to Prof. Chaar because there was an order to director Lopez to fix the scholar organization. But the agreements where never achieved by the regional director Jorge Santiago and Vanesa Lopez. The department of Education allowed the harassment of officials of the Board of Education to increase from June 2021 and also from Jorge Santiago.

28. After that meeting Director Lopez sent the documents related to the committee of planification in the area of the table with all members present and to avoid Prof. Chaar to have any evidence that she was the only one with the change her papers was changed and assigned new Functions to PAD. This is clearly an act of harassment and humiliation.

29. When Prof. Chaar confronted Lopez about the documents, Lopez gave instructions to the members of the faculty and said "vayanse que voy a pelar con Chaar". Director Lopez put her fingers in to the face of Prof. Chaar almost touching her eyes and said "te voy a dar". Prof. Chaar immediately again went running, nervous, confused, hurt, afraid and fearing for her life.

This is the second time that director puts her fingers in Prof. Chaar face. Once again, this situation causes fear, confusion, anguish, nerves, sadness and humiliation.

30. Prof. Chaar went looking for help. She went to the Board of Education, but she was rejected. Prof. Chaar requested a cease and desist and notified the board of education from the harassment, the humiliation and from the physical aggression from the director. But Prof. Chaar never got an answer from the Board of Education. Prof. Chaar made lots of complains that legal division rejected her to accept any complains, forcing her to send the complains by local post office letter and by email. Clearly the Board of Education neglect the claims of Prof. Chaar complains where ignored also she was rejected to make complains in the legal division. This acts by the Board of education is a pattern of harassment against Prof. Chaar, being continuously being humiliated, treated in a bad way, being insulted and now ignoring her, being rejected and devaluating her claims.

31. Director Lopez didn't want to sign the DE14 for Prof. Chaar. Related with her assistance in which the professors need so they can get their salary. The director to justify the denied to sign the DE14 director put in the comments saying that there should be an investigation that Prof. Chaar was stealing Days and director made it public in the faculty.

32. Under this false premise, its clearly directed to harass Prof. Chaar that Lopez is rejecting to sign DE14 from Prof. Chaar. Also, while Prof. Chaar was exposed with COVID19 in or between august 2021 and September 2021. The Board of education through the helper of the regional director of San Juan. Authorized Prof. Chaar to pounch virtual and in the presence days until September 30, 2021. Because even though Prof. Chaar had Covid19 Prof. Chaar was still doing class virtual for her students. But director Lopez closed the virtual pounch and informed Prof. Chaar even though she had Covid19 that she needs to go to school to pounch no virtual and

if she didn't come to school in presence, she was going to take her paycheck. In that moment in the news in Puerto Rico school Republica de Colombia a news came out saying director doesn't follow Covid19 protocols and its contaminating everyone.

33. Prof. Chaar presented more than 20 complains in the Legal Division from the board of Education. Some of them were presented in person and others by certified mail and email. It was presented by mail and email because when Prof. Chaar went to Legal Division the person who receives the public said they will not receive no more complains from Prof. Chaar and her son. Because has a mother they had a lot of complains against the Director of the Instituto Tecnologico director of her son.

34. In other words, the board of education informed that Prof. Chaar on many occasions from February 2020 and the rest of the academic year they will not receive any complains. The methods to send complain was by certified mail and email and directed to the director of Legal Division Attormey Nolan Portalatin. The reason was because Prof. Chaar had been trying to help her son and making complaints in Legal Division so that her son can get his Accommodations with his studies. They made a label to both mother and son to deny the entrance to the Legal Division. As consequence as an employee of the Board of Education Prof. Chaar can use the office of Legal Division and she is getting discriminated and retaliated by Legal Division.

35. In august 2021, the Union asociacion de maestros made a complain. In the meeting was present Prof. Chaar, Director Lopez, coordinator asociacion de maestros and Lissette de Jesus superintendent Auxiliar. The reason of the complaint was that director Lopez didn't want to accept the DE14 from prof. Chaar. Also, the Instituto Tecnologico was mentioned where her son was studying, and Prof. Chaar explained that all the professors from the School Republica de Colombia except Prof. Chaar doesn't have School Program and that director Lopez refused to give it to Prof.

Chaar. In the meeting Prof. Chaar informed again about the acts of harassment from Director Lopez and requested a cease and desist of the harassment.

36. In that same month august 2021, the Union asociacion de maestros made another complain against the Director Lopez. That director said to Prof. Chaar in a hostile way that she had to move her desk to another school Juan Ponce de Leon and also the director took the pounch to the other school. This situation caused Prof. Chaar that she couldn't register her hours and that the Director Lopez took advantage to make a unjustified discount to her pay check. Do to the fact that Prof. Chaar had to do DE14 and if there is no pounch in the School Prof. Chaar had to justify her assistance through the DE14. The director Lopez took advantage of the situation to make unjustified discounts to her paycheck. Also, in the meeting it was informed that Director Lopez was still disrespecting Prof. Chaar in front of the faculty, humiliated and director denied to accept or reject the DE14 without a reason. The director was retaining the assigned students' groups in the portal of the students for a long time without a reason and also denied the access the make a pounch in the office like all employees. Also, it was informed that director never follow the agreements that it was stablished in previous meetings. Once again it was requested a cease and desist from director Lopez the harassment against Prof. Chaar.

37. In that same month Prof. Chaar received a call from the school nurse Miss Lizbeth Velez Santana called the personal cell phone and screaming to Prof. Chaar said "te voy a botar de tu trabajo" and hanged up.

38. In September 2021 the Union asociacion de maestros made another complain. The participants of the meeting where Prof. Chaar, coordinator of asociacion de maestros and Miss Yadira Burgos the Helper of the Regional Director of San Juan. It was mentioned that Mr. Jorge Santiago Regional Director and Miss Yadira Burgos accepted that the process about the pattern of

harassment from the director. Miss Burgos told Prof. Chaar about the fear to enter the school and also that Prof. Chaar informed about previous situations that never ceased. It was informed that recently Lopez tried to put her leg when Prof. Chaar was walking in the office to pounce so that Prof. Chaar could fall in the floor.

39. Miss Burgos indicated that any situation like that it had to be done with the Police. That situations related to the Prof. Chaar assistance informed Miss Burgos that Prof. Chaar should send them directly to Mr. Jorge Santiago directly so he can approve them.

40. In the meeting was mentioned that Prof. Chaar recently was positive to Covid19 and even though director Lopez uncomplying with the health protocols requested that Prof. Chaar had to go to the school to work and threatened saying if Prof. Chaar didn't go to work, she will make a discount to her paycheck. Prof. Chaar didn't go to work presently in the school.

41. Even though Prof. Chaar was exposed she continued to work while being with Covid19 with her students in virtual way, sending work by emails, whatapp and other. The Board of Education discounted those days by sick days even tough Prof. Chaar worked with Covid19 from her home in virtual. It was presented a complaint from the Union asocacion de maestros notifying the fear in entering the school because of the director conduct. Only it was recommended that Prof. Chaar should call the police. In that occasion it was informed that Prof. Chaar worked virtual with Covid19 and still it was discounted as sick days.

42. In October 2021 while Prof. Chaar was going to the bathroom, director Lopez approached to Prof. Chaar and walked very near in a hostile way and said she cant use the bathroom, said sit near the trash, said she didn't wanted her near the school, that Prof. Chaar should give classes with a chair that was placed outside (bajo el sol en un pastizal), said that Prof. Chaar had no rights to go outside to go eat in her lunch time and said she was going to throw her out of

her job. Again Prof. Chaar felt fear, scared, nervous, anxiety, confusion and frustration and couldn't go to the bathroom.

43. The events still keep occurring. In the same month October 2021 without any previous notification a person dressed in blue and white approached to Prof. Chaar in the school and identified as Cesar Gonzalez "Gerencial del Departamento" and said to Prof. Chaar that his mission and objective was to throw her out and to make sure that Prof. Chaar never again work in the Board of Education. Prof. Chaar questioned Mr. Cesar Gonzalez and said to Prof. Chaar that her papers that she didn't have no Covid19 where fake, that doctors lied. In that moment Prof. Chaar requested with "Convenio Colectivo" that she had a right to have a coordinator, but Mr. Cesar Gonzalez denied that right.

44. Prof. Chaar, was humiliated, confused and frustrated she was obliged to abandon the School Republica de Colombia and she directed to the Hospital San Francisco.

45. In the Hospital San Francisco Legal Division from the hospital was contacted and informed that the certification and results where correct that Prof. Chaar had no Covid19. Such act was made by Mr. Cesar Gonzalez, that is also a harassment that caused a lot of emotional damage, frustration, fear, confusion and nervousness, also other feelings and emotions to Prof. Chaar.

46. Prof. Chaar immediately went to the Board of Education and meet Mr. Jimmy Caban Rodriguez helper of the Secretary of the Board of Education. The instructions that Mr. Jimmy Caban was Prof. Chaar to return to her school Republica de Colombia and invalidated the determination made by Mr. Cesar Gonzalez. Also Mr. Jimmy Caban said that Mr. Cesar Gonzalez was not "Gerencial" he is a Security from the Board of Education who works at Central Level not with Schools. It was said that Mr. Cesar Gonzalez was doing making determinations and that was not in his functions as a security. Mr. Cesar Gonzalez did not have the authority to do such act.

But worst Mr. Cesar Gonzalez left his area of central level as a security to do such illegal act, threatened and humiliated Prof. Chaar, kicking out of the school with false accusations and in violation to the “Convenio Colectivo”.

47. All these acts had violated the right of a decent job that Prof. Chaar has and has caused Prof. Chaar frustration, humiliation, anxiety, fear, confusion and other damages and sufferings, such as emotional and physic. But unfortunately, this doesn't end here.

48. On October 7 2021 the Union asociacion de maestros made a complain emergency for such acts realized by Cesar Gonzalez and in the next day, Prof. Chaar received a Phone call from Mr. Jorge Santiago regional director. In the call the regional director screamed, humiliated and defamatory to Prof. Chaar and said also he need to see her urgently. Prof. Chaar asked if I could go with a coordinator from the Union, but Mr. Santiago said no and hung the phone. Later after 5 minutes Mr. Santiago called again to say Prof. Chaar can go with the Coordinator from the Union.

49. In the meeting with Mr. Santiago said to Prof. Chaar that she should not worry with Mr. Cesar Gonzalez “que lo ignorara”. But Mr. Santiago said to Prof. Chaar that she needs to stop complaining and not to look for help against director Lopez, if Prof. Chaar continues complaining and seeking help, he be taking her paycheck and threatened to retaliate and such act he did. Also Mr. Santiago said was also prohibiting additional help that Prof. Chaar should not do written and oral complains and not to seek help. All of this was done in front of the member of the Union Asociacion de Maestros who was with Prof. Chaar. Once again, the Board Of Education is violating the rights of a decent job, harassing, humiliating and trying to silence, using threats so Prof. Chaar would stop demanding help to finish the situation, humiliation, harassment and acts directly to hurt and destroy such as emotional and physic.

50. In November 2021 Prof. Chaar went to the school and director Lopez was in the front of the school in the gate, waiting with the nurse from the school. The nurse closed part of the gate and director Lopez was in the middle. Prof. Chaar asked permission to enter, but director Lopez out of nowhere kicked Prof. Chaar in the middle of her chest.

51. As a consequence, Prof. Chaar was dizzy and lost her balance.

52. In December 2021 the regional director called Prof. Chaar to her cellphone and said that she needs to go to his office. Prof. Chaar asked the reason why and the regional director said he couldn't say. In the meeting the regional director gave her an official complain suspending her from labors with pay.

53. In the complaint the son of Prof. Chaar was mentioned, and he is accused of being in the school where Prof. Chaar works. Without informing that director Lopez was requested in hours not in work, under threat and in that moment accompanied by her son in that occasion and he waited her outside the school. Because Prof. Chaar has issues with walking and her son was helping her. Also, that information was not mentioned that it was in hours out of labor.

54. Director Lopez used The Instituto Tecnologico to harass Prof. Chaar and to try to look for ways to get her dismissal unjustified in other word throw her out of her job.

55. Even tough Prof. Chaar was up to date with her documentation of health, the Board of Education did not accept her evidence and decided to make charges against her. In April 2022 3 meeting was done where it was canceled by the Board of Education related to the illegal suspension. Before the meeting the secretary of education made a memo saying the Covid19 Protocols where no longer being used, no Covid19 test where required. Prof. Chaar was still suspended.

56. While she was suspended with her paycheck, waiting for the Board of Education to give a new date for the meeting. Prof. Chaar deprived of her rights and benefits of an employee, such as Premium Pay and the bonus from the pandemia. In other words, the suspension the Board of Education did not pay the bonus for working in the pandemia.

57. In June 2022 the secretary of The Board of Education informed that Prof. Chaar was suspended from work and her paycheck for 60 days in the she received the notification.

58. From the charges that Board of Education was the violation of Covid19 Protocols even though it was no longer valid (it was academic) and that even though it was her first offence in the Board of Education it was supposed to be an amonestation minor. But it was ordered a suspension without paycheck for 60 days. The sanction was excessive and abusing. It's another way to show the abuse of the institutional that has unfolded against Prof. Chaar. The sanction humiliated Prof. Chaar and caused her to suffer anguish and mental sufferings and emotional damages, like other damages like economic and physical.

59. In august 2022 Prof. Chaar went to the Office Human Resources to find information to her re installation and she was informed that the Board of Education had to amend the sentence from the Secretary they were going to take her vacation days. Has a consequence Prof. Chaar had to go back to work in September 2022. But she had to pay her vacation days to the Board of Education that she was paid.

60. In august 2022 Prof. Chaar went back again trying to look for the paper of re installation and in the Office Human Resource from the Board of **Education informed that they had to modify again the sentence of the Secretary of education and the suspension was without paycheck but it will begin in august until November.** Once again showing that the

Board of Education by their employees there is a harassment, institutionalized abuse more than just director Lopez against Prof. Chaar.

61. In September 2022 Prof. Chaar requested an investigation of the situation by the Union Asociacion de maestros. But there was no answer.

62. The Union Asociacion de Maestros sent a letter to Attorney Abigael Leon, Director of Legal Division doing a follow-up indicating that Prof. Chaar made complain to Legal Division such as Certified mail, email and Legal Declarations by the Union Asociacion de maestros. The Legal Division from the Board of Education they just keep silent and the don't answer not even the Union in related to the complains the results. All the complains where given to legal division in order to get an answer or to stop the harassment and mistreatment from the Board of Education.

63. In September 2022 the Union Asociacion de maestros made a complain Paso 3 indicating that Director Lopez has made a Folder against Prof. Chaar with the Help of Mr. Jorge Santiago Regional Director, and it was requested specifically that it should be eliminated from the folder all the content was against her and to stop institutional abuse.

64. One of the acts against Prof. Chaar in the suspension was very worrisome and was also the reason that the union made a complain. There were personal notes from the director Lopez and the nurse nothing more. In other words, as Prof. Chaar saw it didn't have any legal medical papers and not even alternatives was offered to Prof. Chaar. Also, was found that the director Lopez and Mr. Jorge Santiago regional director was doing meeting behind the scenes of Prof. Chaar to talk about the accusation against Prof. Chaar.

65. Prof. Chaar informed the Board of education official complains, in legal division and also with the Union asociacion de maestros. It was mentioned that she never had any

communication with Director Lopez because it was informed that Lopez wanted to hit Prof. Chaar and insult her.

66. While Prof. Chaar was suspended without paycheck Prof. Chaar requested unemployment. But the Board Of Education rejected to sign the form 620 from the department del trabajo. So, Prof. Chaar could at least obtain a answer about unemployment and it was not until almost finishing September 2022 that finally the Board Of Education sent the form. These acts they constitute acts of discrimination, harassment, humiliation and abuse from the Board of Education.

67. When the from 620 was received the departamento de trabajo had to investigate because they couldn't understand why it was skipped the rutinary process in order to suspend without paycheck and it was not until the last weeks of October 2022 that Prof. Chaar got a pay from the departamento de trabajo. The departamento de trabajo concluded that Prof. Chaar didn't do any conduct that could justify the suspension. They said she had a right to get paid from unemployment during the time she was suspended.

68. The manual of Human Resources say that it is the responsibility of the employee that was suspended to carry out procedures 30 days before the reinstallation in order to re activate in the office of Nomina and the pounch from the school.

69. In October 2022 Prof. Chaar went various occasions to the Board of Education to request the re installation and to activate the Nomina for her paycheck.

70. The director of Human Resources Mr. Lenadry Rodriguez informed to Prof. Chaar that he would not give the permission to make the process of re installation and obliged her to wait until November 3, 2022. The last day of the suspension in order to make the re installation, in order to get her on time in Nomina paycheck and to activate the Pounch.

71. This situation was going to affect the payment of the first week of November to Prof. Chaar she went to Nomina Office and talked to the Director of Nomina who said that que the first paycheck of November was already processed and the last paycheck of the last week of November was already in process and until Human Resources doesn't give the order for the re installation the Director of Nomina couldn't do more.

72. Prof. Chaar informed the situation to Mr. Leandry Rodriguez and once again denied to give the paper for the re installation and said until November 3 2022. Has a consequence Prof. Chaar didn't get her paycheck the first 2 weeks of November. She had to wait until later to get the paycheck.

73. This is the same form of discrimination and harassment, the suspension (unjustified) of 60 days converted to 90 days. The reason is because the Board of Education denied to follow the procedures of Personal Docente and to re install Prof. Chaar on time so she could get her pay check on time in November like all the other employees.

74. In November 2022 to the Prof. Chaar was informed that students were informed from the members of the faculty that they were given instructions that the students should not buy any notebooks for English class because Prof. Chaar will be only 3 months has a teacher.

75. Since Prof. Chaar re installed in her job in November after the suspension, other professors have informed to the students they shouldn't enter Prof. Chaar classroom.

76. Director Vanesa Lopez was working in another School.

77. Even though that ExDirector Lopez leaves her new assigned school and goes in working hours to the School Republica de Colombia knowing that Prof. Chaar is there working with her students during labor hours. The exdirector Lopez presence creates a hostile environment

and a negative one and causing fear, confusion, anguish to Prof. Chaar. The Board of Education has allowed the presence of Lopez and was not required to abandon the place.

78. The coordinator from the Union asociacion de maestros had informed Mr. Jorge Santiago Regional Director about the situation. But he never took an action. Meanwhile Lopez was visiting continuously to the school Republica de Colombia and is chasing Prof. Chaar.

79. Not just the presence of Lopez has created institutional harassment against Prof. Chaar. Now the new director has tried to make Prof. Chaar to change her functions and tries to avoid that Prof. Chaar doesn't go with any coordinator from the Union.

80. In December 2022 members of the group of the student's special education, ruta 1, said to Prof. Chaar that Lopez asked them to tell Prof. Chaar that she had 3 months of life in the school as a teacher.

81. In December there was an activity from the faculty that included pictures from all the faculty. But they excluded Prof. Chaar. Prof. Chaar is victim of Bullying and Mobbing. Professors humiliate, they get in the middle of the line so she can't go in line, they laugh at her and they had made aggressive behavior trying to make violence publicly. Prof. Chaar made it written to the new director. But the director informed that he can't do nothing. In addition to this the director doesn't notify the students that had withdrawn from class, they don't provide the phone numbers of the parents from the students and the conditions of the students. The director secretary rejects to make copies of the Professor plans lesson so she can give them in the office. From November 2022 some students suddenly stopped going to English class because members of the faculty have been saying to students, they should not take English class and they should skip it and go to next class and Prof. Chaar will last 3 months in the school.

82. This acts clearly humiliate, confuse, disreputable, cause depression, creates anxiety, sadness to Prof. Chaar who everyday goes to her house with bad memories of a horrible day full of humiliation and attacks unjustified.

83. Between the school janitor and Prof. Chaar there was a friendship who was the janitor who cleans her classroom. In two occasions Prof. Chaar and asked the janitor if she could go and heat up her food, do the fact that Prof. Chaar has a condition that makes her unable walk many times and there is a friendship. The janitor said in that two occasions said yes and also Prof. Chaar shared her food with the janitor. But from the month of December 2022, they had prohibited the janitor to help Prof. Chaar with her food.

84. After Prof. Chaar had returned to school in November 4 2022 there has been many moments that they had tried to hit Prof. Chaar and there as been an extreme lack of respect, bullying, mobbing, they had tried again changer her functions and they had threatened her with Legal Division complains without any justification. Mr. Jorge Santiago informed that he would not interfere with any of Prof. Chaar claims. On December 8, 2022, after they had mentioned situations in a meeting with the Union Asociacion de Maestros and the Regional Director Mr. Santiago and Prof. Chaar gave him 2 letters in the office explaining the situation and looking for an intervention. But the Board of Education never answered her claim.

85. In December 6 2022 the Director of the School Republica de Colombia made a meeting for Prof. Chaar at 7:30 am and when she asked the director if the coordinator of the Union could be part of the meeting, the director got very upset and threatened her to fire her from her job.

86. The former director denied Prof. Chaar to work in peace and harmony and threatened her to make Legal Complains to Legal Division if she didn't change her functions to accept students' groups PAD.

87. All these acts have affected the wellbeing. Tranquility and labor peace from Prof. Chaar and clearly threatened her against her dignity. Ironically all this abuse occurs in the school and in front of the students.

88. There is a law that makes a civil responsibility to all patrons that incur, encourage or allows the harassment or violation to laws against any employers. In this case the Board of Education has allowed and encouraged all kind of violation to laws, harassed, retaliated, discriminated against Prof. Chaar. But it gets worse and worse the Board of Education has incurred in such conduct that is clearly illegal.

89. The law says that it obligates all agencies and supervisors to adopt and implement to prevent all kind of discrimination, harassment, retaliation in their centers works of job. In this case the Board of Education never did.

90. Prof. Chaar communicated the Board of Education all the situation through all kinds of methods mail, email, in person, legal declarations, official complains with the Union and legal Division Complains. But The Board of Education never did anything at all.

91. Before this lawsuit it was presented Prof. Chaar went to the Negociado de Metodos Alternos to find a solution from the Rama Judicial.

92. In the semester of august 2023-2024. Prof. Chaar was transferred to the School of Villa Granada in Rio Piedras.

93. In the very first day of the school. The director named Irelis Villegas Levis said to Prof. Chaar to get out of the school because she had already a Professor for the English class.

94. Immediately Prof. Chaar went to the Regional Offices from The Board of Education and they indicated that position belongs to Prof. Chaar, and she had to return to the mentioned school. That English Teacher Position Belongs to Prof. Chaar.

95. After the Prof. Chaar returned to the school. Director Irelis Villegas since she didn't want Prof. Chaar, she immediately put 2 Professors in one position. In other words, 2 Professors in the same classroom giving class to students without any reason. One of the Professors was young, and the other one was an adult.

96. The 2 Professors in one position in a classroom was called team teaching. Since the beginning Prof. Chaar had no place to sit, they never gave her any materials and employees from the office indicated in various occasions that Prof. Chaar was not Professor in the School.

97. In the Month of September 2023, it was sent an email to Mr. Edgardo Rodriguez from Human Resources from the Region of San Juan. Indicating that there is a mistreatment against Prof. Chaar for the English Position in where 2 Professors were occupying a classroom by the Director of the School.

98. Later by the month of September it was sent a letter to the director Irelis Villegas in reference to the English Position that was in effect by June 10 2023 409 official document of education. Director Never Answered.

99. Prof. Chaar was a month and half sitting in a Chaar of students.

100. In September 19 2023 the Professor who was with the team teaching Miss. Marquez said to Prof. Chaar that she had a meeting with the Social Worker from primary School.

101. When Prof. Chaar arrived at the meeting the Social Worker named Michel Valentin Camacho indicated that she will be leading the meeting. Immediately Prof. Chaar that before making a meeting all Professor have a right to know before the meeting the reason of and there is a Convenio Colectivo between The Board of Education and Asociacion de Maestros that says that all Professors have a right to have an exclusive representation from the union and got a right to be notified before any meeting.

102. Miss. Michel Valentin indicated that she doesn't believe in the Unions.

103. Immediately Miss. Michel Valentin indicated Prof. Chaar that why doesn't she quits her job and started insulting Prof. Chaar. After half an hour the director Ireliis Villegas arrived to the meeting and also started attacking Prof. Chaar and one of the words where get out of your job. Immediately Prof. Chaar said that she feels bad in the meeting that she has to go.

104. In various occasions after the meeting the Social Worker Miss. Michel Valentin went to Prof. Chaar classroom and in front of all the students put her fingers in the face and said in front the students quit your job.

105. Prof. Chaar went in various occasions to the Regional Office in San Juan to notify the current situation.

106. After many requests and many notifications, the 2 Professors were separated from the team teaching. But the Director still insists on keeping 2 Professors in one position even though they were only separated.

107. The director divided the groups to the half to give both Professors the same group but divided.

108. By the Month of September 2023, it was sent an email to the director Ireliis Villegar that says the current situation that there is a harassment and discrimination. Also, it was indicated clearly that if she doesn't want Prof. Chaar that she should indicate to the Region of San Juan so the transfer could be done and avoid any issues. Prof. Chaar indicated clearly please don't do damage me I just want to work. But director never answered.

109. September 2023 it was sent an email to the Director Ireliis Villegas indicating an urgent cease and desist. It was mentioned, harassment, violation to the convenio colectivo,

institutional mistreatment, intimidation, Discrimination and by age, bad psychology used, illegal intervention from an employee. Director never answered.

110. October 2023 it was sent a referral by email to the Social Worker Miss. Elievette Agosto Caceres in which it was indicated that they are using the students.

111. October 1, 2023, it was sent an email to the director Irelis Villegas urgent in which it was beinh notified that they are trying to make an illegal case against me and that the students are saying that they should do bad thing to Prof. Chaar in the class room and they are asking them to provoke me. It was indicated that the Social Worker Miss. Michel Valentin abandoned her functions to make a meeting and attack Prof. Chaar. Director never answered.

112. By the month of October there was a meeting requested by Prof. Chaar in an email saying Urgent Life or Death directed to Miss. Glorimar from the Region of San Juan.

113. In the meeting and the members who were part of was Miss Yanira Lopez Ripoll, Glorimar, Prof. Chaar, Director Irelis Villegas, Mr. Hugo Robles and Mr. Angel Perez from the union asociacion de maestros. In the meeting there where agreements because of the situation that was provoked by the Social Worker Miss Michel Valentin. The agreement was Miss. Michel Valentin would not in any way intervene with the groups from Prof. Chaar. The one will be in charged will be Miss. Elivette Agosto.

114. By the month of October, it was sent an email to Mr. Edgardo Rodriguez Human Resources. Titled urgent request in was mentioned Prof. Chaar needed an environment of peace and harmony for work. Also, a change of school was requested. Never answered.

115. October 25, 2023, it was sent an email to the director Irelis Villegas. Urgent request of Equality. In which for the 3rd time asking for equality in the area of work. It was indicated that the director that Prof. Chaar was being exposed to difficult situations in the classroom. That Prof.

Chaar needs to work in peace and harmony and security. That they are using the students to make an illegal case against me and to make damage unjustified. Director never answered.

116. On November 2, 2023, it was sent an email to Mr. Edgardo Rodriguez Humna Resources. Requesting a change of school. He never answered.

117. Almost before the end of the year 2023 it was made an official complaint against Miss. Michel Valenting in the college of Social Workers. (Colegio de trabajadores sociales)

118. By the month of November 2023, the Union Asociacion de maestros made a complain Paso 2 indicating that the director had a pattern of harassment against Prof. Chaar. It was indicated that the director doesn't attend situations from Prof. Chaar and the director ignores Prof. Chaar and excludes her from official meetings and doesn't want to attend or accept any referrals from the Prof. Chaar. It was also indicated that the students assigned to her where not fair and she has more students than it should be.

119. November 28, 2023, there was a meeting requested by Prof. Chaar. It was indicated clearly that the director was the one who put 2 Professors in the same classroom. Also, it was made an agreement with the referrals from the students who has issues with discipline.

120. December 5, 2023, it was sent an email to the director Urgent acts of mistreatment in the classroom. Director never answered.

121. On December 7 2023 it was sent a email to the director of the school titled urgent informacion confidencial. It was being notified that someone was manipulating students to damage Prof. Chaar unjustified. The director never answered.

122. December 12, 2023, it was sen tan email to Mr. Edgardo Rodriguez Recursos Humanos Nombramientos. Requesting a change of school. He never answered.

123. In January 2024 Prof. Chaar sent a medical Certificate by email to the director Irelis Villegas. Indicating that Prof. Chaar has a condition, and she needs reasonable accommodations. Director never answered Prof. Chaar.

124. In February 2024 it was sent an email to the Director Irelis Villegas urgent requesting a disciplinary action or a sanction because the person still continues. It was indicated that the social worker Miss Michel Valentin left her functions of her office of elementary area to go to the intermediate area to interfere with Prof. Chaar students. It was notified that they are manipulating the students to hurt Prof. Chaar. Has a director it needs to take action. Director never answered.

125. February 8, 2024, the Union asociación de maestros made a complain Paso 2 in which it was indicated that the director Irelis Villegas disrespect Prof. Chaar for not recognizing her position in the school Villa Granada. It was indicated that the director still continues daily, and the director avoids the participation of Prof. Chaar in the meetings of the faculty and activities from the students at the school. It was indicated that the director Irelis Villegas continuously offends and makes bad comments to Prof. Chaar personally and as a professional.

126. In that complain they were never achieved any agreements and immediately the union Asociacion de maestros took a step farther to Paso 3. To the Board of Education. It was indicated clearly that the Board of Education didn't want to do anything with Prof. Chaar situation.

127. February 2024 it was sent an email to Mr. Hugo Robles Social Worker Facilitator. Urgent requesting a cease and desist form the harassment from the Social Worker Miss Michel Valentin. Never got an answer.

128. February 11, 2024, it was sent an email has part of Prof. Chaar functions a referral to the Social Worker Miss. Elievette Agosto.

129. For the month of February 2024, it was made a meeting requested by Prof. Chaar to Miss Glorimar from the Region of San Juan. Indicating that the previous agreements in the meeting in October 2023 they were not being followed as it was stated. The meeting was done and once again they made agreements but, in the end, nobody followed the agreements again.

130. For the month of February 2024, it was sent a email another Medical Certificate from another Doctor indicating the health condition of Prof. Chaar and that she needs reasonable accommodations. Director never answered.

131. February 2024 it was sent an email to Mr. Hugo Robles Social Worker Facilitator requesting an urgent intervention. Indicating that the Social Worker Miss. Michel Valentin left her area of work to be interfering with Prof. Chaar students. Violation to the agreements of the meetings. Never got answer.

132. During the month of February and March 2024 it was sent referrals to the Social Worker Miss. Elivette Agosto has part of Professors function but never saw any results.

133. March 5, 2024, it was sent an email to the Social Worker Miss. Elievette Agosto doing a follow up and worried about the students' referrals and some students where manifesting that they feel bad because they were being sent to damage me. Social Worker Never Answered.

134. During October 2023 until March 2024 Prof. Chaar reported situations from the school students' discipline to the director Irelis Villegas and the Social Worker Elievette Agosto. Never did anything. Reaching to the point that the students came to Prof. Chaar saying that they were sorry asking for forgiveness. Indicating that they were being paid a dollar to hit the Door of the class room.

135. Prof. Chaar in multiple occasions reported the situation. In one of them by WhatsApp to the Director Irelis Villegas. Director answered by her own voice Chaar don't bother anymore keep working and take the next group.

136. Prof. Chaar was exposed to many situations because the director of the school.

137. For the month of March 2024, it was sent an email to the director of the school indicating about the doctor's certificate and that Prof. Chaar was in a lot of pain. It was also indicated that director has to fill a form for the ADA Law. Director never answered.

138. On March 5, 2024, Miss. Maria Alvarado from the program of Help to the Employees (ayuda al empleado). Sent an email to the director Irelis Villegas indicating that the director didn't want to fill the forms for the ADA Law. It was indicated that director should have a meeting with Prof. Chaar in order to fill the documents.

139. March 10, 2024, it was sent an email to the director requesting an important with reference to the harassment and discrimination in the school that good students were being used to hurt Prof. Chaar. Prof. Chaar indicated that she is working in a very sick atmosphere. That the Social Workers have created an atmosphere very worrying. It was indicated that they are harassing Prof. Chaar to quit her job. Also Prof. Chaar requested a Cease and Desist to the social workers from using students and stop fabricating a case against Prof. Chaar. Director never answered.

140. March 2024 it was sent an email to the director with a copy to the Union Asociacion de maestros. Requesting a cease and desist from the harassment in the job. Director never answered.

141. March 29, 2024, it was sent an email to the director and the Union Asociacion de maestros. Urgent mi work and my life are in Danger I am innocent requesting a cease and desist. Director never answered. It was indicated that the social workers where harassing Prof. Chaar in

a visible way and they were treating her publicly specially in the meetings and was being asked to take back Miss Valentin to her the office of Primary school and to stop using students and parents. Once again director never answered.

142. By the month of March Prof. Chaar received a letter from The Agency Equal Employment Opportunity a letter from a Determination. They have found Age Discrimination in Employment Act of 1967, as amended (ADEA) and the Americans with Disabilities Act of 1990, as amended (ADA). The Comission attempts to eliminate the alleged unlawful practices by informal methods of conciliation. The Board of Education was given days to answer and to solve. They never answered.

143. Days later Prof. Chaar gave a copy to the Regional Director Mr. Jorge Santiago, Edgardo Rodriguez and Director Irelis Villegas.

144. Prof. Chaar made a complain "Colegio de Trabajador Social" against Michel Valentin and in April 1 2024 i received an email from "Colegio de Trabajador Social" indicating that is the director who should intervene and take necessary actions while the complaint is in progress.

145. **After the Determination of The Agency Equal Employment letter of Determination** on April 8, 2024, an email was sent to Mr. Edgardo Rodriguez Human Resources in which was being notified that the director without any notification prohibited Prof. Chaar from entering the school without any reason. The director notified that Prof. Chaar lost her job and told her to get out.

146. As a request from Prof. Chaar notified the situation. The Regional offices of San Juan indicated in the last minute that Prof. Chaar will be in "Medida Cautelar". That Prof. Chaar has to report to work in the Region of San Juan.

147. Since the director and the Social Workers had no way of kicking Prof. Chaar out of her job. First the Social Workers went to the court of San Juan and made a petition of restraining order against Prof. Chaar. In the content they described they were not talking about important situation they were talking about my son and my family and telling lies about Prof. Chaar. Since they are social workers the way they made their claim of streaming order was out of etic denigrating me and my whole family. They did that in order to no to remove me or change me of school they did it with the intention of throwing Prof. Chaar out of her job.

148. They were out of control. Not just to put a restraining order in the Court of San Juan. They also went to the Court of Carolina. Since the court of San Juan never gave them an “exparte” the only gave them a citation only. They did it knowing that no one can’t be judge 2 times for the same accusations and the cases con only be seen in San Juan not in Carolina because it is out of jurisdiction. At the same time, they only mentioned labor issues and it was supposed to be academic because Prof. Chaar was no longer in the school.

149. Later in the same month later. The director Irelis Villegas went to the court of San Juan to put a restraining order against Prof. Chaar but this time using the student’s minor law. The director attacked me personally mentioning my entire family in the citation.

150. The issue doesn’t end here. The director and the social workers went to area of where Prof. Chaar lives (her community) and they started talking and telling neighbors to put orders against Prof. Chaar. They did it with the malice.

151. In the end all the restraining order were denied in one of them it was said no elements exist to put a restraining order.

152. While Prof. Chaar was in “Medida Cautelar” Prof. Chaar was never provided any reasonable accommodations.

153. It was informed to everyone in the Board of Education and including the Secretary of Education Miss. Yanira Raices. All of them they never did anything.

154. By the month of April 17 and 18 2024 Miss Maria Alvarado from the office Employees Help (Ayuda al Empleado) sent an email to the Secretary of Education Miss. Yanira Raices. She was requesting urgently in order to save the physical health and emotional health from Prof. Chaar. She indicates that no one is managing the situation with any Reasonable Accommodations in which can cause an accident with the stairs. Was mentioned it was the second time that she is referring the situation. She indicates clearly that if they don't take action to give reasonable accommodation to Prof. Chaar, she can have a fatal accident that could have be prevented. Also, in the email was mentioned that the Regional Director of San Juan Mr. Jorge Santiago refer the situation to the Legal Division to Attorney Juan Orlando Rodriguez in the area of Civil Rights in Education in order to manage the situation. He never did anything.

155. In various in the Office of Help to the Employee referrer the situation. But nobody did anything. It was informed that Prof. Chaar is an employee she is an adult, and she has many health conditions. That her physical condition one of them is she doesn't have strength in her hands, and she can't lift them up. That she can't hang well in the stairs railings in order to go up or down. It was requested for security and health that Prof. Chaar should be in a area where it is more easy access in order to avoid an accident.

156. Also, one of the restraining orders from the social workers against Prof. Chaar was mentioned that she has animal excrement.

157. Prof. Chaar went to the legal division of The Board of Education to make a complain. The investigator Mr. Ramon Guzman said that she didn't have a right to make a complain. In other words, Prof. Chaar is being denied to make a complaint in Legal Division.

158. This is a clear sign that the Board of Education answered once again after the letter of Determination of Equal Employment once again harassing, retaliating against Prof. Chaar in a very aggressive way with the objective to throw Prof. Chaar out of her job unjustified.

159. Every year I tried and request a job for all the teacher of summer class. But without any merits they never accept Prof. Chaar. No matter how many requests of employment Prof. Chaar. But other persons who are younger than Prof. Chaar and have less studies they accept them to work in Summer Classes. In other words, no matter what kind of job position i try to request the Board of Education denies me and not even as a student helper.

160. The Law 100 Protects people with against age Discrimination and also Federal Law Age Discrimination in Employment Act (ADEA Law against Discrimination by age).

161. Also, the ADA Law prohibits the discrimination against people with disabilities in several areas, including employment, transportation, public accommodations, communications and access to state and local government programs and services.

162. Also, the section 504 ADA Law forbids any kind of retaliation against any individual who exercises his or her rights under Section 504 are considered to be discrimination and are unlawful. Recipients of federal funds are prohibited from intimidating, threatening, coercing or discriminating against any individual for the purpose of interfering with any right or privilege secured by Section 504 or Title II.

163. This acts, also constitutes a violation to the article 1802 from the Civil Code of Puerto Rico.

164. All the statements said are a clear violation to any of these laws above mentioned.

165. Prof. Chaar has suffered also economic damages that goes beyond 20,000.00.

166. The Board of Education also allowed the harassment, retaliation and all kind of violations to all laws and procedures.

167. If this previous act described keep continuing, Prof. Chaar will continue to suffer extensive damages and unrepairable.

168. As a consequence of this acts made by The Board Of Education, undue pressure, aggression, harassment, retaliation, discriminating and not following the ADA Law Reasonable Accommodations, Prof. Chaar has suffered intense anguishes and emotional damages, like the humiliations, the agony, confusion, pain, mental sufferings, damages and Physical sufferings such as lack of sleep, lack of appetite and emotional trauma, omissions that should be valorated all together no less than 250,000.00 and any other remedies that by right proceeds.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, today 7 de Agosto de 2024.

Louises Chaar
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